

ALSTON & BIRD LLP

90 Park Avenue
New York, NY 10016

212-210-9400
Fax: 212-210-9444
www.alston.com

MEMO ENDORSED

Alexander S. Lorenzo

Direct Dial: 212-210-9528

E-mail: alexander.lorenzo@alston.com

September 7, 2010

VIA ELECTRONIC MAIL

The Honorable Richard J. Sullivan
United States District Court
Southern District of New York
500 Pearl Street, Room 640
New York, New York 10007

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
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Re: *Federal Insurance Co. v. The Estate of Irving Gould, et. al.*,
10 Civ. 1160 (S.D.N.Y.) (RJS);
The Estate of Irving Gould, et. al. v. Chartis Insurance Co. of Canada, et. al.
(the "Third-Party Action")

Dear Judge Sullivan:

As counsel for Chartis Insurance Company of Canada (f/k/a American Home Assurance Company (Canada Branch)) ("Chartis") in connection with the above-referenced Third-Party Action, I write pursuant to the Court's Individual Rules of Practice to request respectfully a twenty-day extension to Chartis's August 31, 2010 deadline to respond to the Third-Party Complaint. Third-Party Plaintiffs' counsel has consented to this request.

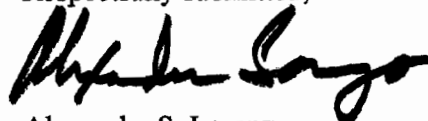
My firm was engaged in connection with the Third-Party Action late last Friday afternoon. Upon retention, we learned from the docket that Chartis had been served by Third-Party Plaintiffs via the State of New York Insurance Department on August 10, 2010 and that Chartis's deadline to respond to the Third-Party Complaint was August 31, 2010. Unfortunately, there appears to have been a delay in the service copy of the Third-Party Complaint getting from the Insurance Department to our client's in-house counsel's office; as a result, my firm was not engaged until the August 31 deadline had passed.

We are presently working with our client to finalize its response to the Third-Party Complaint and we respectfully request that the deadline for Chartis to respond be extended to September 20, 2010, twenty days from the original deadline. This is Chartis's first request for an adjournment.

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I am available at Your Honor's convenience to discuss any questions regarding this request.

Respectfully submitted,



Alexander S. Lorenzo

cc: Counsel of Record

SO ORDERED
Date:

9/7/10



RICHARD J. SULLIVAN
U.S.D.J.